

Alliance for Automotive Innovation¹ Statement on Enabling Recommendation ER3.3.6: Require IoT Privacy Information on new car automobile "Monroney Stickers"

The best way to protect the privacy of consumers is through a single, national privacy law that provides clear and consistent protections to consumers across the United States regardless of the device or technology that they are using. A piecemeal, sectoral approach – such as the auto-specific approach being proposed in the draft IoT Advisory Board Report – may end up unintentionally creating more confusion for consumers.

The Monroney label provides an important point of reference for consumers on safety and fuel economy information, but – given limitations on the practical size of the label – it is becoming increasingly challenging to accommodate additional information on the label in a way that is useful and understandable to consumers. For that reason, any decision to incorporate additional information on the Monroney label should be carefully considered and data driven so that it does not inadvertently detract from or diminish other safety and environmental information that is important to consumers at the point of sale. Finally, the contents of the Monroney label are established through National Highway Traffic Safety Administration and Environmental Protection Agency rules and any changes to that content may require a lengthy formal rulemaking process. In the meantime, automakers remain committed to providing consumers with clear and meaningful notices about the collection, use, and sharing of vehicle data.

¹ The Alliance for Automotive Innovation represents the manufacturers that produce most of the cars and light trucks sold in the United States, original equipment suppliers, battery makers, technology companies, and other value chain partners within the automotive ecosystem. Representing approximately 5 percent of the country's GDP, responsible for supporting 10 million jobs, and driving \$1 trillion in annual economic growth, the automotive industry is the nation's largest manufacturing sector.